

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	CASE NO. 21-01666/MCF
	*	
SHARON ORTIZ ALAMO	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S REPLY TO TRUSTEE'S *MOTION TO DISMISS* DOCKET NO. 51
AND IN COMPLIANCE WITH ORDER, DOCKET NO. 54.**

TO THE HONORABLE COURT:

NOW COMES, SHARON ORTIZ ALAMO, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 51, whereby the Trustee requests the Court to dismiss the present Chapter 13 case based on Plan arrears incurred by the Debtor, in the sum of \$1,155.00, in the above captioned case.

2. On June 22, 2022, this Honorable Court issued an *ORDER*, Docket No. 54, whereby the Debtor is Ordered to reply within 30 days to the *Trustee's Motion to Dismiss* (Docket No. 51), which Order is due by July 18, 2022.

3. The Debtor hereby respectfully informs the Court that on July 18, 2022, she made one (1) \$1,155.00 payment, check number 103104100051149, respectively, to cure the arrears in the confirmed Plan. Attached is copy of the payment made to the Trustee, as evidence of having cured the arrears.

4. The Debtor respectfully submits that she is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to take note of said Plan payments and deny the Trustee's motion to dismiss, Docket no. 51, in the above captioned case.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing Reply to the *Trustee's Motion to Dismiss*,

Docket No. 51, and in compliance with *Order* dated June 22, 2022, Docket No.54, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing system which will send notifications od such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Services copy of this motion to the following non-participant: the Debtor, Sharon Ortiz Alamo, HCO1 Box 12025, Carolina PR 00987, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of July, 2022.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR THE DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699/787-963-7699
Email: rfc@rfigueroalaw.com

THIS DOCUMENT HAS A VOID PANTOGRAPH - BORDER CONTAINS MICROPRINTING AND A TRUE WATERMARK ON THE BACK - HOLD AT AN ANGLE TO VIEW

BANCO POPULAR

PO BOX 252708 SAN JUAN, PUERTO RICO 00926-2708
EN ESPAÑOL

OFFICIAL CHECK

Check No. 1031041000051149

Date: 07/16/2022

PAY: ONE THOUSAND ONE HUNDRED FIFTY FIVE DOLLARS AND
00/100

TO THE JOSE R CARRION
ORDER OF CASO 2101656MCF13

REMITTER: SHARON ORTIZ ALAMO
FDIC Member and Federal Reserve System

\$1,155.00

Over \$25,000.00 Two Signature Required.

3596

[Signature]

Authorized Signature

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